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Attorneys for Plaintiff Class

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

BAYSHORE FORD TRUCK SALES, INC., a Delaware corporation; MOTOR CITY TRUCKS, INC., a Delaware corporation; COLONY FORD TRUCK CENTER, INC., a Rhode Island corporation, individually and on behalf of all others similarly situated,

Plaintiffs,
v.
FORD MOTOR COMPANY,
Defendant.

Civil Action No. 99 cv 741 (JLL)

Honorable Jose L. Linares, U.S.D.J.
Honorable Claire C. Cecchi, U.S.M.J.

Document Electronically Filed

**NOTICE OF MOTION FOR
PARTIAL SUMMARY JUDGMENT
ON BEHALF OF PLAINTIFF CLASS**

TO: Dennis R. LaFiura, Esq.
Day Pitney, LLP
200 Campus Drive
Florham Park, NJ 07932-0950
Attorneys for Defendant

COUNSEL:

PLEASE TAKE NOTICE that, the Plaintiff Class shall move before the Honorable Jose L. Linares, U.S.D.J. in the United States District Court for the District of New Jersey, at the Martin

Luther King, Jr. Federal Building & United States Courthouse, 50 Walnut Street, Newark, New Jersey 07101, pursuant to Federal Rule of Civil Procedure 56(a), and the Scheduling Order of Magistrate Judge Claire C. Cecchi, at a date to be set by the Court, for an Order granting partial summary judgment on liability to the Plaintiff Class against Defendant Ford Motor Company.

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely on the concurrently submitted brief of counsel, Local Civil Rule 56.1 Statement on this Motion, the Certification of counsel and the tabbed exhibits attached thereto. A proposed form of Order is enclosed.

Plaintiffs request oral argument on the Motion.



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Attorneys for Plaintiff Class

DATED: June 5, 2009
969208

CERTIFICATE OF SERVICE

I certify that on Friday, June 5, 2009, I caused Plaintiffs' notice of motion for partial summary judgment on behalf of the class members, brief in support, certification of counsel and proposed form or Order to be filed via ECF.

I further certify that on Friday, June 5, 2009, I caused the original papers to be filed with the Clerk of the United States District Court, M.L. King Jr. Federal Bldg. & Courthouse, 50 Walnut Street, Newark, NJ 07202 via Federal Express Priority Overnight with two copies to the Chambers of the Honorable Jose L. Linares, U.S.D.J.

I further certify that on Friday, June 5, 2009, I caused a copy of the papers to be served upon Ford Motor Company's Counsel of Record via Federal Express Overnight Delivery and via electronic mail as follows:

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I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



RONALD J. CAMPIONE

Dated: June 5, 2009